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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

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UNITED STATES OF AMERICA

v.

IMRAN ALRAI

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18-cr-192-01-JL
December 5, 2019

TRANSCRIPT EXCERPT OF BENCH TRIAL TESTIMONY
OF ELAINE SINGER
BEFORE THE HONORABLE JOSEPH N. LAPLANTE

APPEARANCES:

For the Government:

John S. Davis, AUSA
Matthew Hunter, AUSA
Cam T. Le, AUSA
U.S. Attorney's Office

For the Defendant:

Timothy M. Harrington, Esq.
Timothy C. Ayer, Esq.
Shaheen & Gordon, PA

Also Present:

John J. Commisso, Esq.

Court Reporter:

Susan M. Bateman, RPR, CRR
Official Court Reporter
United States District Court
55 Pleasant Street
Concord, NH 03301
(603) 225-1453

I N D E X

<u>WITNESS:</u>	<u>Direct</u>	<u>Cross</u>	<u>Redirect</u>	<u>Recross</u>
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<u>ELAINE SINGER</u>				
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By Mr. Davis	3			
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<u>EXHIBITS</u>	<u>FOR ID</u>	<u>IN EVD</u>
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Government's Exhibit No. 649.		17
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Government's Exhibit No. 619.		23
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1 P R O C E E D I N G S

2 MR. DAVIS: The government calls Elaine
3 Singer.

4 ELAINE SINGER

5 having been duly sworn, testified as follows:

6 THE CLERK: For the record, please state your
7 full name and spell your last name.

8 THE WITNESS: Elaine Singer, S-I-N-G-E-R.

9 DIRECT EXAMINATION

10 BY MR. DAVIS:

11 Q. Ms. Singer, were you employed at United Way?

12 A. Yes.

13 Q. And for how many years?

14 A. 21.

15 Q. And what was your title there?

16 A. When I exited, it was system analyst database
17 manager.

18 Q. System analyst database manager?

19 A. Yes.

20 Q. And prior to that what was your job title?

21 A. Application trainer.

22 Q. And during several years in the last part of
23 your career at United Way did you work under Imran
24 Alrai's supervision?

25 A. Yes.

1 Q. So you reported to him?

2 A. Yes.

3 Q. And would you identify him in the courtroom if
4 you see him?

5 A. Yes.

6 Q. Can you point him out, please.

7 A. Right over there, the middle gentleman.

8 Q. All right. And are you now retired from
9 United Way?

10 A. Yes.

11 Q. All right. So, Ms. Singer, can you explain
12 just briefly what your job role was when you were
13 supervised by Mr. Alrai? What kind of things did you do
14 at United Way?

15 A. I managed the internal -- the database,
16 management of the pledge processing system. I assisted
17 with the help desk with Office programs: Word, Excel.

18 I also did the billing, processing invoices
19 and blanket orders, getting them set up, and purchase
20 orders.

21 Q. Okay. So what's a blanket order?

22 A. A blanket order is a -- it's like a PO,
23 purchase order, where it covers the whole year. So you
24 would set an amount for, like, \$50,000 to pay invoices
25 that's continuous coming through the year.

1 Q. All right. And so an invoice can be under or
2 subject to a blanket order?

3 A. Yes.

4 Q. And were many of the invoices that you
5 processed of that kind?

6 A. Almost all of them were, yes.

7 Q. Okay. Who was the IT department under Mr.
8 Alrai besides you?

9 A. IT director? I'm sorry.

10 Q. I'm sorry. Who were the department? Who were
11 the employees?

12 A. Oh. Susan Piscitelli and myself.

13 Q. And what did Susan do?

14 A. She did more of working with companies to get
15 our web pages up, anything to do with the web or with
16 the Andar.

17 Q. Okay. So she did web and you did more finance
18 related stuff?

19 A. Finance and the database.

20 Q. And the database. Okay.

21 What was Mr. Alrai like as a manager for you?

22 A. He was nice.

23 Q. How would you describe his style?

24 A. Hands-off pretty much. I did my job and he
25 left me to do my job.

1 Q. And was that fine with you?

2 A. Yes.

3 Q. All right. How often would you see him in the
4 office?

5 A. Twice a week maybe for maybe a half a day.

6 Q. And do you recall the days he was there?

7 A. I was what? I'm sorry.

8 Q. What days of the week did he come?

9 A. Tuesday, Thursday.

10 Q. Okay. And how long was he -- when would he
11 arrive and when would he leave?

12 A. He would usually arrive around 10 o'clock on
13 an average and he would probably leave around maybe 1, 2
14 o'clock sometimes.

15 Q. All right. And did you know about a teaching
16 assignment that he had?

17 A. Yes.

18 Q. And was there a particular evening that he
19 taught?

20 A. That I was not aware of, a particular evening.
21 I wouldn't know.

22 Q. Okay. And does United Way have a lot of open
23 areas without closed offices?

24 A. Yes.

25 Q. And people have cubes?

1 A. Yes.

2 Q. And is that true even of high-level managers,
3 they don't have their own office with a door that
4 closes?

5 A. Yes. Recently, yes.

6 Q. And did you sit near Mr. Alrai?

7 A. Yes. He was right next to me.

8 Q. And what floor was that?

9 A. Third floor.

10 Q. Okay. And were you familiar with his cube?

11 A. Yes.

12 Q. And what would he do when he came to work with
13 that cube?

14 A. He would come in, put his stuff down, and go
15 off to meetings or -- I rarely saw him sitting there.

16 Q. Okay. And was there a phone, a hard-line
17 phone at that cube?

18 A. Yes.

19 Q. Did you ever see him use it?

20 A. No.

21 Q. And did he have a desktop computer at that
22 cube?

23 A. Yes.

24 Q. Did you ever see him use that?

25 A. No.

1 Q. And when he wanted to make phone calls, do you
2 recall what he would do about that?

3 A. He generally would, like, either go into a
4 conference room or walk away and use his cell phone.

5 Q. So do you ever remember overhearing him on a
6 phone call as he sat at the cube next to you just out in
7 the open?

8 A. No. It was rare, very, very rare if he did,
9 and it was dealing with something that I would have
10 dealt with.

11 Q. All right. Did you know of AISA, a
12 corporation, A-I-S-A?

13 A. I know of it because when he started I kind of
14 looked them up on the web and I saw that he was part of
15 that, yes.

16 Q. All right. And what did you find on the web
17 about AISA and Mr. Alrai?

18 A. He was the CEO, I believe, of that company.

19 Q. All right.

20 A. But I didn't check any further into it.

21 Q. Did you ask him about AISA?

22 A. No, I don't believe I did.

23 Q. Did he ever tell you whether he worked at
24 AISA?

25 A. No.

1 Q. Okay. Did Mr. Alrai make any changes in your
2 system accesses after he started?

3 A. Yes.

4 Q. And explain that.

5 A. I used to be able to get into the SQL database
6 and maybe restart the services for the system. I could
7 go in, and if I needed assistance from the company that
8 owned like Andar, our system, I could get into the
9 system and let them into the system and do things. I'm
10 not an IT person, but I had access to give them so it
11 was brought.

12 Q. And so what happened to that access after he
13 started?

14 A. I always had to contact Digital Services (sic)
15 in order to get them to go in and do it.

16 Q. When you say Digital Services, do you mean
17 DigitalNet?

18 A. DigitalNet. I'm sorry. Yes, DigitalNet.

19 Q. And did Mr. Alrai explain to you why he wanted
20 DigitalNet to have to do that for you?

21 A. I don't remember. I don't remember if he did.

22 Q. Okay. Did you ask him about it?

23 A. Yeah, because that's the way -- I believe he
24 said that's the way it's going to be, you know, it's
25 more they know what they were doing so --

1 Q. Okay. Now another -- when Mr. Alrai started,
2 were you involved in finance and processing invoices?

3 A. No.

4 Q. And did he introduce you to that kind of work,
5 or how did that happen?

6 A. When he started he asked me how the processing
7 of pledges, not pledges, of invoices happened, and I
8 knew the basic work of it and I explained to him what a
9 PO, blanket order, and so forth, and how the invoices
10 did get processed, but I never did them prior to him.

11 Q. So you gave him an explanation about how
12 United Way processed invoices?

13 A. Uh-huh.

14 Q. And what happened after that?

15 A. I got another job duty of processing the
16 invoices of that.

17 Q. Okay. And after that time did you handle
18 invoices that had to do with IT?

19 A. Yes.

20 Q. And particularly, did you handle invoices that
21 were submitted by DigitalNet Technology Solutions?

22 A. Yes.

23 Q. Did you actually handle a lot of them?

24 A. Every month.

25 Q. All right. And did he talk to you about, are

1 you interested in doing the financial process, is this a
2 new duty that you could take on? What was your
3 discussion about that, if any?

4 A. There wasn't any. He just told me I was going
5 to do it, you know, so --

6 Q. All right. And do you recall whether any
7 other supervisor or manager at United Way ever
8 questioned that, like, why are you now doing invoices?

9 A. Yeah.

10 Q. What's that?

11 A. Yes, they did.

12 Q. And who questioned it and what was -- how was
13 that resolved?

14 A. Like Dom, I can never pronounce his last name,
15 in finance, he questioned me. He was like, why are you
16 doing this, you know, Imran should be doing this, or Pat
17 Latimore, you know, questioned as to why I was doing it.

18 Q. Okay. So let's talk about DigitalNet.

19 Do you recall when they came in in 2012 to do
20 a risk assessment? Were you aware of that?

21 A. I knew it was going on, but I didn't know who
22 the players -- the companies that were coming in.

23 Q. And had you ever heard of them before that?

24 A. No.

25 Q. Okay. And that was after Mr. Alrai was

1 working there, right?

2 A. Right.

3 Q. And after that did you have interactions with
4 DigitalNet employees?

5 A. Yes.

6 Q. And who were the employees you interacted
7 with?

8 A. It started with Nadeem, last names, I'm sorry,
9 and Idir, and then Jasmin came in after Idir left.

10 Q. Okay. And you would talk with them?

11 A. Yes.

12 Q. And were they on the second floor below you?

13 A. They were on the third floor with me.

14 Q. They were on the third floor with you. Okay.
15 What about Kal?

16 A. And Kal I met once. He came in the office and
17 I did meet him, and then I would work with Jasmin and
18 Idir, the three, and they would go to Kal, and
19 eventually I started going directly with Kal.

20 Q. So you would talk to Kal on the telephone from
21 time to time?

22 A. Yes.

23 Q. All right. And did you know where he was when
24 you talked to him?

25 A. I assumed that he was in California.

1 Q. And did you ever speak to Mr. Alrai about
2 where Kal was?

3 A. Yeah. Yes. And again, I was led to believe
4 he was in California.

5 Q. All right. Did you ever talk to anyone else
6 at DigitalNet besides Jasmin, Idir, Nadeem, and Kal?

7 A. Unless it's the programmers. Towards the end
8 I did talk with the programmers with Imran there.

9 Q. With Imran there?

10 A. Uh-huh.

11 Q. And was that on a particular project?

12 A. Yes.

13 Q. And what was that project?

14 A. Sales force. To get data moved from the Andar
15 system to sales force, trying to get it to go
16 seamlessly.

17 Q. Okay. And what year was that? Do you recall?

18 A. It was probably in the early part of the year
19 before he left.

20 Q. Okay. So that would have been '17?

21 A. Has it been that long? Yes, I guess.

22 Q. And do you remember who you talked to and how
23 many programmers you talked to?

24 A. I don't remember how many, their names elude
25 me, but I know that they were in our Andar system.

1 Q. Okay. And what happened with that project?

2 A. It was a difficult project doing that process,
3 and it kind of just died and I went back to doing it my
4 normal manual way.

5 Q. Okay. And did that project ever get
6 completed?

7 A. Yes, with TBS.

8 Q. All right. So after Mr. Alrai left?

9 A. Yes.

10 Q. And not with DigitalNet?

11 A. Not with DigitalNet.

12 Q. Okay. And was that project the only project
13 you talked to programmers about?

14 A. Yes.

15 Q. Okay. And on those phone calls Mr. Alrai was
16 on the phone with you?

17 A. He was in the room with me.

18 Q. Okay. Did you ever talk to someone named
19 Mohammad for DigitalNet?

20 A. No.

21 Q. Did you ever talk to someone named Munawar or
22 Mac for DigitalNet?

23 A. No.

24 Q. And did Mr. Alrai ever mention a Mohammad?

25 A. No.

1 Q. And did he ever say that his father was with
2 DigitalNet?

3 A. No.

4 Q. Okay. Now, in your department what was the
5 largest cost that you had?

6 A. DigitalNet.

7 Q. Okay. And how much were you paying
8 DigitalNet? Were there two basic contracts?

9 A. Two basic contracts. I can give you mostly
10 the monthly one.

11 There was one contract for, like, phones, and
12 that was like 16,000 monthly, and then the other one was
13 more like I believe 58,000 for computer services.

14 Q. All right. The first one was so-called
15 Telephony services, the 16,000, the telephone system?

16 A. Telephones, yes.

17 Q. And you're aware there was a contract for
18 that?

19 A. Blanket order, yes.

20 Q. And you would do a blanket order every year?

21 A. Yes.

22 Q. And then you would issue it -- or you would
23 pay invoices under that blanket order?

24 A. Yes.

25 Q. And then the second one, was that the managed

1 IT services contract with DigitalNet?

2 A. Yes.

3 Q. And the same thing, you would pay invoices
4 under that contract?

5 A. Yes.

6 Q. Okay. Now, who would you talk to at
7 DigitalNet about their invoices, if anyone?

8 A. Imran. I never talked to anybody else about
9 their invoices. Just Imran.

10 Q. All right. And why was that? Were you told
11 that or was that -- why did that happen?

12 A. He always handed me the invoices and he was my
13 point of contact for that process of it.

14 THE COURT: All right. And did he tell you he
15 was a point of contact or did you just assume that?

16 THE WITNESS: He said, you know, if you have
17 any questions, deal with me.

18 Q. All right. Now, was that true of other
19 vendors at United Way or at IT? Did other vendors send
20 their invoices directly to you or directly to United
21 Way?

22 A. Directly to me.

23 Q. All right. And would you get those from Imran
24 Alrai?

25 A. No.

1 Q. Only the DigitalNet ones?

2 A. There was one other one that came from him.

3 Q. And was that Insight?

4 A. Thank you. Yes, Insight.

5 Q. Okay. So let's look at Government Exhibit
6 649. Do you recognize your e-mail address that you're
7 copied on this in 2017?

8 A. Yes.

9 Q. And do you recognize Mr. Alrai's address at
10 supportunitedway.org?

11 A. Yes.

12 MR. DAVIS: Your Honor, I move to admit 649
13 and strike the ID.

14 MR. AYER: No objection, your Honor.

15 THE COURT: It's admitted.

16 (Government's Exhibit 649 admitted)

17 Q. All right. Now, let's just look at the
18 message in the e-mail.

19 Do you know Sonia Curiel?

20 A. Yes.

21 Q. And she was in accounts payable?

22 A. Yes.

23 Q. And did she write you and Mr. Alrai an e-mail
24 here?

25 A. I don't remember this one but --

1 Q. Can you read the text just before you?

2 A. Okay. "I am setting up DigitalNet for EFT
3 payments," okay, yes, "through our financial system.
4 Part of the information I need is an e-mail from your
5 main contact for them to receive an automatic message
6 each time there is a payment processed. Please provide
7 it at your earliest convenience."

8 Q. So what's an EFT?

9 A. EFT, electronic funds transfer.

10 Q. Okay. And so Sonia is asking for a contact at
11 DigitalNet, correct?

12 A. Right.

13 Q. Just at the top, so what's the reply that Mr.
14 Alrai gives?

15 A. The reply?

16 Q. You see an e-mail address there?

17 A. Oh, info@digitalnet, yeah.

18 Q. Do you see that?

19 A. Yeah.

20 Q. Did you know about that e-mail account or use
21 it?

22 A. No, I've never used that account.

23 Q. Okay. But you see it there, right?

24 A. Yes, I do.

25 Q. Okay. So let's talk about paying the

1 DigitalNet invoices.

2 MR. DAVIS: Can we start with just the exhibit
3 of invoices already admitted which I don't have a number
4 of.

5 MS. SHEFF: That would be 309.

6 MR. DAVIS: Exhibit 309 in evidence.

7 Thank you, Ms. Sheff.

8 Q. Now, this is just an exhibit of invoices.
9 We're looking at the first one, and this would have been
10 in 2013, and do you see "Okay to pay Elaine Singer"
11 there?

12 A. Yes.

13 Q. Is that your handwriting and signature?

14 A. Yes.

15 Q. Okay. So let's just scroll down and look at a
16 few more.

17 The next one, "Okay to pay, Elaine Singer,"
18 right?

19 A. Yes.

20 Q. And let's go a couple of years ahead and see
21 how they look.

22 Okay. Here we are in 2014 September, okay to
23 pay, there's a reference to blanket 674. Is that the
24 blanket order you talked about?

25 A. Yes.

1 Q. All right. And how about -- how do they look
2 in 2016? I'm sorry, I'm just asking Ms. Sheff to go a
3 bit further forward.

4 And here we are in 2016. This is a \$69,000
5 invoice from DigitalNet, and what have you written there
6 again?

7 A. "Okay to pay," and the blanket order is 737,
8 so it's the next year.

9 Q. Okay. And last ones in 2018.

10 MR. DAVIS: Does it go that far, Ms. Sheff?

11 Q. Here's one from January of 2018. You're still
12 doing the same thing, right?

13 A. Right.

14 Q. Blanket 866, "Okay to pay Elaine Singer"?

15 A. Right.

16 Q. And these are the kinds of invoices you would
17 process for DigitalNet, correct?

18 A. Right.

19 Q. All right. And this is \$16,000. Is that one
20 of the telephone ones that you talked about?

21 A. Yes.

22 Q. Okay. All right. So you said that you would
23 get these invoices by hand; is that right?

24 A. Right.

25 Q. And how did that work? What would happen?

1 A. Imran would come in on that Tuesday, usually
2 it was Tuesday I got the invoices, and he would hand it
3 over to me and ask me to get it paid.

4 Q. Okay. Did you ever get them by e-mail?

5 A. Once in a while if he couldn't get into the
6 office he would send me an e-mail with the attachment,
7 yes.

8 Q. Okay. But otherwise he would actually give
9 you the hard copy invoice?

10 A. Right.

11 Q. Okay. Were the DigitalNet invoices for the
12 current month or for the next month?

13 A. The next month.

14 Q. And was that unusual?

15 A. I thought so but, you know, it was approved to
16 go ahead with it, yes.

17 Q. And did you ever talk to Mr. Alrai about that?

18 A. I think early on, but that's the arrangement
19 that was made I gathered so --

20 Q. Okay. And when you signed the invoice and
21 said "Okay to pay," what would you do with it then?

22 A. I would make a copy for myself and then hand
23 it over to I guess accounts payable.

24 Q. Okay. And accounts payable would have been
25 who?

1 A. Sonia.

2 Q. Okay. And what would have been the time lag
3 between when you hand it to AP and when it actually got
4 paid by ACH?

5 A. Probably within a week.

6 Q. Okay. United Way would pay its bills quickly?

7 A. Well, yes, yes.

8 Q. Okay. When you -- did you ever have occasion
9 to hear about delays in payments to DigitalNet?

10 A. I'm sorry?

11 Q. Did anyone ever complain if the payment was
12 not right away to DigitalNet?

13 A. Imran would say something, for me to check to
14 see, it's not paid yet, can you check on it.

15 Is that your question?

16 Q. Yes, I think so.

17 So you recall him talking to you about asking
18 you to check on it?

19 A. Yes.

20 Q. Okay. And how often did that happen?

21 A. I don't know how often. Every once in a while
22 if it wasn't paid right away, yes.

23 Q. So I'll show you Exhibit 619, and let's go
24 back. Do you recognize this as an e-mail from Imran to
25 Elaine Singer to your e-mail account?

1 A. Yes.

2 MR. DAVIS: Your Honor, I move to admit 619
3 and strike the ID.

4 MR. AYER: No objection, your Honor.

5 THE COURT: It's admitted.

6 (Government's Exhibit No. 619 admitted)

7 Q. Let's go to the beginning of the e-mail chain.
8 Down at the bottom here, can you read that
9 first note on March 10th of 2014?

10 A. "Hello, Imran. Could you provide an update on
11 the Telephony services invoice. It is still unpaid.
12 Thanks. Mohammad."

13 I never paid any attention to that.

14 Q. I'm sorry?

15 A. I never paid any attention to the name. Okay.
16 Yes.

17 Q. Right. And below that, had Mohammad written
18 an earlier note on March 10th? Do you see that?

19 A. Oh. "Hello, Imran. PFA invoices for April
20 that are due upon receipt via ACH. Thanks and regards."
21 Okay.

22 Q. Mohammad, right?

23 A. Mohammad.

24 Q. Okay. So then Mr. Alrai writes you a note,
25 right?

1 A. Yes.

2 Q. What does that say there in the middle of the
3 page?

4 A. "Can you please follow up on the invoices
5 15507 for the phone services for 14,494.43. I know that
6 finance miscoded the account and this bucket shows not
7 enough available funds. Finance was supposed to fix it,
8 and not sure what happened."

9 Q. All right. Let's go to the first page now of
10 the same e-mail.

11 On April 14th of 2014, there near the bottom,
12 what does Mr. Alrai say to you?

13 A. "Please provide me an update for the invoices
14 in 14 days overdue, and DigitalNet is looking for an
15 update from us."

16 Q. Okay. And what happens? You said you would
17 check with Sonia, it has not gone through, right?

18 A. Yeah.

19 Q. You sent Allison an e-mail. He thanks you on
20 the 14th?

21 A. Yes.

22 Q. And then you get back to him later on the
23 14th, something Allison said. What does that say?

24 A. "Allison said that Deanne is the one that does
25 this. She is on vacation until Wednesday and she was

1 gone all last week. I didn't get the PO until 4/7, just
2 before her vacation."

3 Q. Okay. And what's his last communication to
4 you on this same e-mail chain?

5 A. "Okay. Please follow up with her on Wednesday
6 and see if she can send the money same day. Thanks."

7 Q. Okay. Would you -- let's talk a little bit
8 about near the year-end. Was United Way on a fiscal
9 year?

10 A. Yes.

11 Q. And when did the fiscal year end?

12 A. June 30th.

13 Q. And would you have conversations with Mr.
14 Alrai about the budget with the year-end coming?

15 A. Yes.

16 Q. And what do you remember about that?

17 A. Either there wasn't enough money to pay the
18 next invoice that he needed to be paid.

19 Q. To DigitalNet?

20 A. To DigitalNet.

21 Q. All right. And so what would happen?

22 A. United Way would always allow 10 percent over.
23 So the invoice would adjust.

24 Q. What do you mean the invoice would adjust?

25 A. To the 10 percent overage.

1 Q. So you get an invoice from Mr. Alrai that
2 would be 10 percent over his budget amount?

3 A. Right, right.

4 Q. And then that would be processed and paid?

5 A. Yes.

6 Q. And did you notice that as a pattern?

7 A. Yeah. Yes.

8 Q. Okay. And what would have happened if the
9 invoice was say 15 or 20 percent, what would the United
10 Way finance have done?

11 A. Imran would have had to go and justify it to
12 get more money and move money around to get it paid.

13 Q. All right. But at 10 percent he doesn't have
14 to justify it, right?

15 A. Yes.

16 Q. Okay. All right. You talked about Insight
17 invoices. What do you remember about Insight and what
18 kind of service did they provide?

19 A. I could never figure it out from what their
20 invoices said. I believe it was more like a VPN access
21 for it for us.

22 Q. Okay. And you got those invoices also from
23 Mr. Alrai?

24 A. Yes.

25 Q. And would he hand-deliver those just like the

1 DigitalNet ones?

2 A. Yes.

3 Q. What did you notice about what he was giving
4 you with the Insight invoices?

5 A. They were always in the past, way in the past.

6 Q. So months back?

7 A. Months back.

8 Q. And did you ever ask him why?

9 A. Yes.

10 Q. And what did he say?

11 A. He didn't give me a clear explanation. He
12 goes, oh, it just got missed or something. Never a
13 clear explanation why.

14 Q. Okay. And was there a time that Mr. Alrai
15 told you to change the date on an Insight invoice?

16 A. Yes.

17 Q. Can you explain that? What happened there?

18 A. Well, Sonia wouldn't process it because the
19 date was so far back and it was -- so, yes, and so he
20 had me change the date on it.

21 Q. To make it a fresher date?

22 A. Fresher date.

23 Q. And were you comfortable doing that?

24 A. No.

25 Q. And did you talk to him about that?

1 A. Yes.

2 Q. And what did he say?

3 A. He goes, it's all right, just go ahead and
4 process it.

5 Q. All right. You talked about you couldn't
6 really understand the Insight invoice.

7 A. Right.

8 Q. The DigitalNet invoices and the line items on
9 there, was there a lot of information on those?

10 A. No.

11 Q. And what do you mean by that?

12 A. It was just like one statement saying what it
13 was, but it wasn't in detail, and every month it was
14 pretty much the same thing. Every month was routine.

15 Q. And were you concerned about that at all?

16 A. I assumed that it was done in the contract in
17 that way, because I think when they first came I asked
18 him, you know, is this all there is. Yeah, so it was
19 processed through.

20 Q. You asked Mr. Alrai, is this all there is?

21 A. Yes. Information.

22 Q. Did you ever ask him if you could call the
23 DigitalNet people and give them some instruction on how
24 to give you more detail?

25 A. I don't believe I did, no.

1 Q. Okay. All right. What about the budget for
2 the IT department? Did you work on that as well with
3 Mr. Alrai?

4 A. Yes.

5 Q. And did he as the department head have
6 signature authority for budgets?

7 A. Yes.

8 Q. All right. But were there things that he
9 could not be the signatory on?

10 A. Yes.

11 Q. Okay. And what was that and can you explain
12 that?

13 A. Certain dollar amount levels he was not
14 permitted. So each level has a -- so Pat, his
15 supervisor, would have to sign.

16 Q. All right. And were there certain budget
17 items that he would have you write up requisitions for?

18 A. Yes.

19 Q. And why did -- well, explain that. You would
20 sit with Mr. Alrai and he would ask you to write up a
21 requisition?

22 A. Right. I wrote up all the requisitions and
23 had him sign. So I would fill out the address of the
24 company, the name of the company, how much, one item,
25 and then the amount of that for the year.

1 Q. All right. And did that seem strange to you?

2 A. It was the process of the United Way. So no,
3 no.

4 Q. All right. And were there times when he would
5 ask you to -- he would tell you to make a particular
6 purchase that was something he wanted?

7 A. Yes.

8 Q. And you would put that in your requisition?

9 A. Yes.

10 Q. Okay. Was there -- at some point did you
11 begin to suspect that Mr. Alrai was part of DigitalNet?

12 A. Yes.

13 Q. And how did that come up?

14 A. It just seemed suspicious on how some things
15 were handled. Like, for instance, I dealt with Nadeem
16 and his team on some issues, but if I would ask them to
17 do something, they would say, oh, I don't know, we have
18 to check with Imran. I would go, why do you have to
19 check with Imran, because I was asking for DigitalNet to
20 do something, not Imran to do something, and so I
21 just -- I said, okay. I would ask Imran, and then Imran
22 would go to DigitalNet, I assumed, and come back and say
23 do it.

24 And there were just several other little
25 things that happened throughout the time that happened,

1 like when I was -- needed something for the programmers
2 to do and I called Kal and I said, I don't know, I'm
3 waiting on your programmers to call me or to do
4 something, and he goes, they're not my programmers, and
5 I go, oh, okay, because then it came that they were
6 Imran's programmers.

7 Q. So you had this suspicion. Did it seem right
8 to you if Mr. Imran Alrai, the vice president of IT,
9 also was connected to DigitalNet?

10 A. No, it's not right, no.

11 Q. Okay. Did you ever raise it with management
12 at United Way?

13 A. No.

14 Q. Why not?

15 A. Several reasons. One, it was a guess. And
16 the other reason is that I kind of tried to blow the
17 whistle on CWAIN, that a program that they were creating
18 for us wasn't working and they were charging us like
19 millions of dollars to do this, and we were, like,
20 forced to say, yes, it works, go to the next step, yes,
21 it worked, and it wasn't working. And I went to Pat and
22 Jane Grady and said this and told them about that, and
23 my life went to hell after that one. So, like, for a
24 couple years no raises. It was terrible.

25 So I wouldn't go again. I wouldn't.

1 Q. Okay.

2 A. I knew that the CWAIN project did not work.
3 I was guessing with the DigitalNet.

4 Q. Okay. All right.

5 MR. DAVIS: Nothing further. Thank you.

6 THE COURT: Well, we may as well take the
7 lunch break. It's 12:30. We've been going over 90
8 minutes. So I'm going to ask you to return at 1:30, all
9 right?

10 THE WITNESS: Okay.

11 THE COURT: Don't talk to counsel during the
12 break except -- you can talk to United Way's counsel but
13 nobody in the front of the rail.

14 THE WITNESS: Okay.

15 THE COURT: We're in recess.

16 (RECESS)
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C E R T I F I C A T E

I, Susan M. Bateman, do hereby certify that the foregoing transcript is a true and accurate transcription of the within proceedings, to the best of my knowledge, skill, ability and belief.

Submitted: 3-23-20

/s/ Susan M. Bateman
SUSAN M. BATEMAN, RPR, CRR